

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA

v.

YANNICK MINANG

No. 1:2017-mj-06327

ASSENTED-TO MOTION TO MODIFY CONDITIONS OF RELEASE

Defendant Yannick Minang (“the defendant”), by and through undersigned counsel, respectfully requests this Honorable Court modify his conditions of release to a.) reduce the hours of his current curfew; and b.) permit him access to, and use of, the internet. As grounds, the defendant avers and states as follows:

The defendant currently stands charged, via complaint, with money laundering, in violation of 18 U.S.C. §§ 1956(a)(1)(B)(i) and 1956(a)(1)(B)(ii). He was released after his initial arraignment on September 29, 2017, on conditions that include, *inter alia*, electronic (location) monitoring; an 8 PM – 6 AM curfew; and proscription from using, or having devices capable of accessing, the internet without permission from U.S. Probation and Pretrial Services.¹ Among his other conditions is that he actively seek employment. To date, the defendant, who completed three (3) years at University in his native Cameroon, and had been taking classes at Framingham State College, has been unable to find/pursue meaningful employment in large part because of his inability to use the internet to search for employment opportunities and/or communicate with

¹ It is undersigned counsel’s recollection that in imposing the current conditions of release on September 29 this Honorable Court stated it would be open to terminating monitoring if the defendant “do[es] well” on his curfew --- or words to that effect. Through this particular motion the defendant is not seeking full elimination of the monitoring condition. He does, however, reserve his right to revisit that particular condition as a whole at a later time, as seemingly consistent with this Court’s suggestion.

prospective employers. Moreover, because of his current curfew he is not able to apply for evening employment, including seasonal sales clerk positions at “big box” department stores in the Boston area, who are often looking for nighttime employees during this time of year. While the defendant cannot identify any specific job opportunities at this particular time that will be available to him should his conditions be modified as requested, he is confident that his chances at finding/landing suitable employment, even on a part-time basis, will increase accordingly.

Undersigned counsel has spoken with Assistant U.S. Attorney Neil Gallagher about the defendant’s requested modifications, pursuant to L.R. 7.1. AUSA Gallagher has stated he has no objection, so long as U.S. Probation and Pretrial Services agrees. U.S. Probation and Pretrial Services Officer Chrissy Murphy has, in turn, stated that she assents to the defendant’s motion to modify in both respects (i.e., internet access/use and reducing the hours of the curfew), and believes an 11 PM – 6 AM curfew to be reasonable. As a result, the defendant hereby requests that this Honorable Court modify his current conditions of release to permit him internet access/use² and to reduce the hours of his curfew from the current 8 PM – 6 AM to 11 PM – 6 AM.

WHEREFORE, the defendant respectfully requests his Assented-to Motion to Modify his Conditions of Release be granted as requested.

² The defendant’s request in this regard presumes permission will be given, should his motion be granted, for the defendant to access the internet in his home and/or via his personal electronic device(s).

Dated: November 19, 2017

Respectfully submitted,
YANNICK MINANG
By and through his attorneys,

/s/ R. Bradford Bailey
R. Bradford Bailey, BBO#549749
BRAD BAILEY LAW, P.C.
10 Winthrop Square, 4th Floor
Boston, Massachusetts 02110
Tel.: (857) 991-1945
Fax: (857) 265-3184
brad@bradbaileylaw.com

Certificate of Service

I, R. Bradford Bailey, hereby certify that on this the 19th day of November, 2017, I caused a true copy of the foregoing *Assented-to Motion to Modify Conditions of Release* to be served upon all necessary parties to this matter by virtue of electronically filing the same via the CM/ECF system.

/s/ R. Bradford Bailey
R. Bradford Bailey